

REMARKS

The final Office Action objects to claims 3, 4, and 7-12 due to informalities; rejects claims 5, 6, 11, 12, 15, and 18 under 35 U.S.C. § 112, second paragraph, as indefinite; and rejects claims 1-12 and 14-21 under 35 U.S.C. § 103(a) as unpatentable over KUNG et al. (U.S. Patent No. 6,252,952) in view of MURPHY (U.S. Patent No. 6,754,224), and further in view of WHITE et al. (U.S. Patent No. 6,069,890). Applicant respectfully traverses the claim objections and rejections.

By the present amendment, Applicant proposes amending claims 3-12 to improve form. No new matter has been added by way of the present amendment. Claims 1-12 and 14-21 remain pending.

Applicant filed Information Disclosure Statements on February 16, 2001, November 14, 2003, and July 8, 2004. These Information Disclosure Statements have not been properly considered by the Office. Applicant respectfully requests that the Examiner properly consider these Information Disclosure Statements, initial the Form-1449s, and return a copy of the initialed Form-1449s to Applicant with the next communication.

Claims 3, 4, and 7-12 stand objected due to informalities. Applicant proposes amending the claims to address the informalities raised in the final Office Action. Accordingly, Applicant requests that the objection to claims 3, 4, and 7-12 be reconsidered and withdrawn.

Claims 5, 6, 11, 12, 15, and 18 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly indefinite. Applicant proposes amending 5, 6, 11, and 12 to address the issues raised in the final Office Action.

For at least the foregoing reasons, Applicant requests that the rejection of claims 5, 6, 11, 12, 15, and 18 under 35 U.S.C. § 112, second paragraph, be reconsidered and withdrawn.

Claims 1-12 and 14-21 stand rejected under 35 U.S.C. § 103(a) as unpatentable over KUNG et al. in view of MURPHY, and further in view of WHITE et al. Applicant respectfully traverses this rejection.

Independent claim 1 is directed to a hybrid type telephony system capable of establishing a connection between conventional type telephone sets contained in an exchange unit and LAN type telephone sets contained in an IP network. The system includes a gateway circuit connected between the exchange unit and the IP network and performing voice data format conversion; and a central control unit connected to a LAN of the IP network for establishing a communication path to the exchange unit via a control bus, controlling switching of IP packets of the IP network, managing IP address information of the LAN type telephone sets and the gateway circuit via the LAN, and controlling connection between the LAN type telephone sets and connection between the LAN type telephone sets and the gateway circuit. The control bus forms a communications path for enabling the central control unit to control a time-division switch for the conventional type telephone sets and an IP switch for the LAN type

telephone sets. KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, KUNG et al., MURPHY, and WHITE et al. do not disclose or suggest a control bus that forms a communications path for enabling the central control unit to control a time-division switch for the conventional type telephone sets and an IP switch for the LAN type telephone sets. The final Office Action relies on KUNG et al.'s element 200 for allegedly corresponding to the recited central control unit and KUNG et al.'s element 210 as allegedly corresponding to the recited control bus (final Office Action, pg. 4). Applicant disagrees.

Element 210 in KUNG et al. corresponds to a central router (see, for example, Fig. 2). KUNG et al. discloses that central router 210 provides Ethernet switching and aggregates traffic between servers, gateways, and IP network 120 and/or ATM network 185 backbone (col. 6, lines 52-58). One skilled in the art would readily appreciate that KUNG et al.'s central router 210 is not a bus, as that term is known in the art. The final Office Action does not point to any section of KUNG et al. that supports the allegation that central router 210 can be construed as a bus.

Moreover, even assuming, for the sake of argument, that KUNG et al.'s central router 210 could reasonably be construed as a bus, Applicant submits that KUNG et al.'s central router 210 does not enable IP central station 200 (which the final Office Action alleges corresponds to the recited central control unit) to control a time-division switch for conventional type telephone sets and an IP switch for LAN type telephone sets. The final Office Action seems to admit that KUNG et al. does not disclose a time-division

switch (final Office Action, pg. 4). Therefore, it is unclear how the final Office Action can reasonably rely on KUNG et al.'s central router 210 for enabling a central control unit to control a time-division switch for conventional type telephone sets and an IP switch for LAN type telephone sets when the final Office Action admits that KUNG et al. does not disclose a time-division switch.

The disclosures of MURPHY and WHITE et al. do not remedy the above deficiencies in the disclosure of KUNG et al.

For at least the foregoing reasons, Applicant submits that claim 1 is patentable over KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination.

Claims 3, 5, 7, 9, 11, and 14-17 depend from claim 1. Therefore, these claims are patentable over KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Independent claim 2 recites features similar to features recited above with respect to claim 1. Therefore, claim 2 is patentable over KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claim 1.

Claims 4, 6, 8, 10, 12, and 18-20 depend from claim 2. Therefore, these claims are patentable over KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 2.

Independent claim 21 is directed to a hybrid type telephony system. The system includes a time-division switch in which conventional type telephone sets are connected;

an IP switch in which LAN type telephone sets are connected; a gateway circuit which performs converting between a first voice format to connect the conventional type telephone sets and a second voice format to connect the LAN type telephone sets; a LAN which connects the gateway circuit and the IP switch; a control bus which connects the time-division switch, the IP switch, and the gateway circuit; and a central control unit, connected to the LAN by way of the control bus, which establishes a communication path of the time-division switch, performs a switching control of IP packets in the IP switch, and controls the gateway circuit and manages IP address information of the LAN type telephone sets and the gateway circuit via the LAN, and which controls connection between the LAN type telephone sets and the gateway circuit. KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, KUNG et al., MURPHY, and WHITE et al. do not disclose or suggest a control bus that connects the time-division switch, the IP switch, and the gateway. The Examiner relies on element 210 in KUNG et al. for allegedly disclosing this feature (final Office Action, pg. 10). Applicant disagrees.

As set forth above, element 210 in KUNG et al. corresponds to a central router (see, for example, Fig. 2). KUNG et al. discloses that central router 210 provides Ethernet switching and aggregates traffic between servers, gateways, and IP network 120 and/or ATM network 185 backbone (col. 6, lines 52-58). One skilled in the art would readily appreciate that KUNG et al.'s central router 210 is not a bus, as that term is known

in the art. The final Office Action does not point to any section of KUNG et al. that supports the allegation that central router 210 can be construed as a bus.

Moreover, even assuming, for the sake of argument, that KUNG et al.'s central router 210 could reasonably be construed as a bus, Applicant submits that KUNG et al.'s central router 210 does not connect a time-division switch, an IP switch, and a gateway circuit. The final Office Action seems to admit that KUNG et al. does not disclose a time-division switch (final Office Action, pg. 11). Therefore, it is unclear how the final Office Action can reasonably rely on KUNG et al.'s central router 210 for connecting a time-division switch, an IP switch, and a gateway circuit when the final Office Action admits that KUNG et al. does not disclose a time-division switch.

Also, the final Office Action relies on KUNG et al.'s central router 210 as allegedly corresponding to a switch in which conventional type telephone sets are connected and to an IP switch in which LAN type telephone sets are connected (final Office Action, pg. 9). It is unclear how the final Office Action can reasonably allege that a single device corresponds to a switch, an IP switch, and a control bus that connects the switch and the IP switch. If this rejection is maintained, Applicant respectfully requests that the Examiner explain how KUNG et al.'s central router 210 can correspond to these three separate features of Applicant's claim 21.

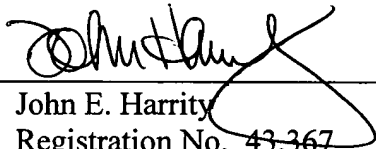
For at least the foregoing reasons, Applicant submits that claim 21 is patentable over KUNG et al., MURPHY, and WHITE et al., whether taken alone or in any reasonable combination.

In view of the foregoing amendments and remarks, Applicant respectfully requests the Examiner's reconsideration of this application, and the timely allowance of the pending claims. Applicant respectfully requests that the present amendment be entered since the amendment places the application in condition for immediate allowance.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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